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January 9, 2014

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 13-IEP-1A
1516 Ninth Street
Sacramento, CA 95814-5512
via email docket@energy.ca.gov

California Energy Commission

DOCKETED

13-IEP-1A

TN 72455

JAN 09 2014

Re: 2013 Integrated Energy Policy Report Update Comments

Marin Clean Energy (MCE, formerly known as the Marin Energy Authority) appreciates the opportunity to comment on the California Energy Commission's (CEC's) 2013 Integrated Energy Policy Report Update (IEPR). Although MCE recognizes that its own load was not included in the IEPR Update, MCE appreciates that the CEC is ensuring MCE's load is included in future IEPR Reports. MCE further recommends that the CEC should include not only MCE's load, but the load of other Community Choice Aggregators (CCAs) as they develop.

I. MCE Background

MCE administers the first CCA program in California and currently serves approximately 125,000 customers throughout Marin County and within the City of Richmond. MCE is a not-for-profit public agency formed to reduce greenhouse gas emissions by providing the local communities it serves with the choice to consume electricity with a higher renewable content than the default offering provided by Pacific Gas and Electric (PG&E), the incumbent Investor Owned Utility (IOU). MCE's customers are currently fully resourced through 2015 and have long-term power purchase agreements with terms that are typically 20 to 25 years. MCE's current peak load is approximately 210 MW. However, both the County of Napa and the City of Albany have begun the process in order to join MCE's service territory. Therefore, MCE's peak load may be growing in the upcoming years.

II. Incorporating MCE and Other CCA Load Projections into the IEPR

MCE is deeply appreciative of its continuing collaboration with CEC in order to incorporate its load into future IEPRs and other load projections produced by the CEC. However, MCE also

recommends that the CEC develop processes for other CCA loads to be incorporated into key reports.

Indeed, incorporating CCA load into CEC projections is required by statute. The California Public Resources Code §25302.5(b) indicates: “The [CEC] shall perform an assessment in the service territory of each electrical corporation of the loss or addition of load described in this section and submit the results of the assessment to the Public Utilities Commission.” The loss or addition of load that should be assessed specifically includes load of community choice aggregators in accordance with §25302.5(a)(1)(A).

Sonoma Clean Power (SCP) is California’s newest CCA, and will begin service to customers in 2014. The CEC should ensure that SCP and other forthcoming CCAs are able to include their load projections into CEC reports in accordance with §25302.5(a)(1)(A).

MCE respectfully requests the CEC develop a streamlined process for the incorporation of CCA load in accordance with the California Public Resources Code. MCE is deeply appreciative of the staff resources dedicated to addressing the incorporation of its own load into future CEC reports and looks forward to its continuing collaboration with the CEC.

Sincerely,

A handwritten signature in cursive script that reads "Shalini Swaroop".

Shalini Swaroop
Regulatory Counsel